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2019 FEB 21 PM 1:06

U.S. BANKRUPTCY COURT
MARY A. SCHOTT, CLERK

4 Debtor In Propria Persona

5 UNITED STATES BANKRUPTCY COURT

6 DISTRICT OF NEVADA - RENO

7 IN RE:) Case No. BK-N-14-50333-BTB
 8 ANTHONY THOMAS and) Case No. BK-N-14-50331-BTB
 9 WENDI THOMAS) (Jointly Administered)
 10 AT EMERALD, LLC) CHAPTER 7
 11 Debtors.)
 12) DECLARATION OF DOROTHY THOMAS
 13) RE: LIMITED OPPOSITION TO ABANDON
 14) Date: March 6th 2019
 15) Time: 10:00 a.m.
 16) Judge: Hon. Bruce T. Beesley
 17) Courtroom: 2
 18)
 19)

14 I, Dorothy Thomas declare:

15 1. I am submitting this Declaration in support of Debtor Anthony Thomas's
 16 Limited Opposition to the Trustee's Motion to Abandon the Portola property.

17 2. I, along with my husband Eli Thomas am the owner of the 397 2nd Ave.
 18 Portola Property that I now understand the Trustee wishes to abandon, without
 19 specifying to whom she intends to abandon the property.

20 3. I have read the Declaration of my son Anthony Thomas in Support of his
 21 Limited Opposition to the Trustee's Motion to Abandon the property as well as the 2
 22 letters that my son sent to Mr. Hartman, and I support both those letters and what they
 23 intend to do, that is first correct a misstatement of the facts that the Portola property
 24 was transferred in exchange for \$200,000 and agree with the statement of facts as
 25 presented by my son in his letter to the Trustee's attorney requesting that he correct
 26 the misstatement of facts as represented in his letter.

27 4. I have also read the second letter attached to my son's Declaration as
 28 Exhibit 2 requesting 5 points to allow my son to assist in ensuring that the cloud on title

1 created by the illegal actions of the Trustee and her attorney in illegally attempting to
2 take possession, breaking and entering, vandalizing and changing the locks on the
3 Portola property illegally as well as illegally obtaining title insurance and listing the
4 property for sale. There is also the issue of possible burglary and theft of items from
5 the home due to the failure of the Trustee and her Attorney to respond to my request
6 for an inventory of items at the time of the illegal property takeover.

7 5. The fact that Attorney Hartman refuses to agree to the modest 5 points
8 raised in my son's 2-5-2019 letter attached to his declaration as Exhibit 2 shows the
9 bad faith conduct and intention of both the Trustee and her attorney in this regard, and
10 will create a further burden to myself and my husband who are now saddled with the
11 responsibility to clearing title and the mess that the Trustee and her attorney have left
12 without taking any responsibility for their actions or assisting us in clearing title as
13 requested in the letter sent by my son to Mr. Hartman on 2-5-2019.

14 6. I am specifically requesting that this Court issue an order
15 conveying/abandoning the property to me and my husband Eli & Dorothy Thomas,
16 issue an order allowing my son and his wife to facilitate the formal recording and
17 acknowledgment of the 2008 conveyance by Deed without any need for further Court
18 order or approval of the Bankruptcy Court as well as ordering the Trustee and her
19 attorney to lift or cancel the Lis Pendens recorded against the Portola property.

20 I declare under penalty of perjury under the laws of the State of California, the
21 laws of Nevada and the laws of the United States that the foregoing is true and correct.
22 Executed at: Saratoga, CA on February 20th, 2019.

Mrs Dorothy Thomas
Mrs. Dorothy Thomas - Owner
of 397 2nd Ave. Portola, CA Property

CERTIFICATE OF SERVICE

I certify that I am an adult, over the age of 18 years, not a party to the action herein who resides in Washoe County, Nevada. I caused to be served the foregoing document via e-mail to the following persons as listed below from my e-mail address of mickjoseph@sbcglobal.net as follows:

LIMITED OPPOSITION TO TURNOVER MOTION
DECLARATION OF ANTHONY G. THOMAS
DECLARATION OF CHRIS PERNA
DECLARATION OF DOROTHY THOMAS

JEFFREY A. COGAN
jeffrey@jeffreycogan.com, beautausinga@gmail.com, beau@jeffreycogan.com
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renobktrustee@gmail.com, jcoppaknudson@ecf.episystems.com
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JOSEPH G. WENT
jgwent@hollandhart.com, vllarsen@hollandhart.com
I declare under penalty of perjury that the foregoing is true and correct.
Dated: February ____ 2019.

/S/ Mick Joseph

MICK JOSEPH